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20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 WAYMO LLC,

24 Plaintiff,

25 v.

26 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

27 Defendants.

28 Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANTS' OPPOSITIONS TO
WAYMO'S MOTIONS IN LIMINE NOS. 1,
13, 14, 15 AND 17**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants
2 Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in
3 good standing of the Bar of the District of Columbia. I make this declaration in support of Defendants’
4 Briefs in Opposition to Waymo’s Motions *in Limine* Nos. 1, 13, 14, 15 and 17. I make this declaration
5 based on personal knowledge and if called as a witness, I could and would competently testify to the
6 matters set forth herein.

7
8 2. Attached as **Exhibit 28** is a true and correct copy of an excerpt from a document
9 produced by Uber in this action bearing the Bates numbers UBER000060504.

10
11 3. **Exhibits 29 and Exhibit 30** have been intentionally left blank.

12
13 4. Attached as **Exhibit 31** is a true and correct copy of a document produced by Waymo in
14 this action bearing the Bates numbers WAYMO-UBER-00021132 through WAYMO-UBER-00021133.

15
16 5. Attached as **Exhibit 32** is a true and correct copy of a document produced by Waymo in
17 this action bearing the Bates numbers WAYMO-UBER-00001496 through WAYMO-UBER-00001499.

18
19 6. Attached as **Exhibit 33** is a true and correct copy of a document produced by Waymo in
20 this action bearing the Bates numbers WAYMO-UBER-00032547.

21
22 7. Attached as **Exhibit 34** is a true and correct copy of a document produced by Waymo in
23 this action bearing the Bates numbers WAYMO-UBER-00033705.

24
25 8. Attached as **Exhibit 35** is a true and correct copy of a document produced by Uber in this
26 action bearing the Bates numbers UBER00301331 through UBER00301339.

27
28 9. Attached as **Exhibit 36** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00047062 through WAYMO-UBER-00047063.

10. Attached as **Exhibit 37** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00022238.

11. Attached as **Exhibit 38** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00041064-WAYMO-UBER-00041065.

12. Attached as **Exhibit 39** is a true and correct copy of a document produced by Waymo in
this action bearing the Bates numbers WAYMO-UBER-00086800-WAYMO-UBER-00086808.

1
2 13. Attached as **Exhibit 40** is a true and correct copy of a document produced by Waymo in
3 this action bearing the Bates numbers WAYMO-UBER-00086815-WAYMO-UBER-00086816.
4

5 14. Attached as **Exhibit 41** is a true and correct copy of a document produced by Waymo in
6 this action bearing the Bates numbers WAYMO-UBER-00083658-WAYMO-UBER-00083660.
7

8 15. Attached as **Exhibit 42** is a true and correct copy of a document produced by Waymo in
9 this action bearing the Bates numbers WAYMO-UBER-00084600-WAYMO-UBER-00084601.
10

11 16. Attached as **Exhibit 43** is a true and correct copy of a document produced by Waymo in
12 this action bearing the Bates numbers WAYMO-UBER-00086836.
13

14 17. Attached as **Exhibit 44** is a true and correct copy of excerpts of a document produced by
15 Waymo in this action bearing the Bates numbers WAYMO-UBER-00086885-WAYMO-UBER-
16 00086892.
17

18 18. Attached as **Exhibit 45** is a true and correct copy of a document produced by Uber in this
19 action bearing the Bates number UBER00077210.
20

21 19. Attached as **Exhibit 46** is a true and correct copy of a document produced by Waymo in
22 this action bearing the Bates numbers WAYMO-UBER-00086932-WAYMO-UBER-00086939.
23

24 20. Attached as **Exhibit 47** is a true and correct copy of a document produced by Waymo in
25 this action bearing the Bates numbers WAYMO-UBER-00004175-WAYMO-UBER-00004194.
26

27 21. Attached as **Exhibit 48** is a true and correct copy of excerpts of the deposition transcript
28 of Gaetan Pennecot, dated April 20, 2017.
29

30 22. Attached as **Exhibit 49** is a true and correct copy of excerpts of the deposition transcript
31 of Gaetan Pennecot, dated August 9, 2017
32

33 23. Attached as **Exhibit 50** is a true and correct copy of Defendants Uber Technologies, Inc.
34 and Ottomotto LLC's Responses to Waymo's First Set of Common Interrogatories (Nos. 1-3), served
35 July 28, 2017.
36

37 24. Attached as **Exhibit 51** is a true and correct copy of excerpts of the deposition transcript
38 of Daniel Gruver, dated August 4, 2017.
39

40 25. Attached as **Exhibit 52** is a true and correct copy of Defendants Uber Technologies, Inc.
41 and Ottomotto LLC's Responses to Waymo's First Supplemental Responses to Waymo's Second Set of
42

Common Interrogatories (Nos. 4-7), served August 8, 2017.

26. Attached as **Exhibit 53** is a true and correct copy of excerpts of the deposition transcript of David Drummond, dated August 21, 2017.

27. Attached as **Exhibit 54** is a true and correct copy of excerpts of the deposition transcript of Michael Epstein, dated August 22, 2017.

28. Attached as **Exhibit 55** is a true and correct copy of excerpts of the deposition transcript of Jolie Sorge, dated August 21, 2017.

29. Attached as **Exhibit 56** is a true and correct copy of excerpts of the deposition transcript of Anthony Levandowski, dated August 22, 2017.

30. Attached as **Exhibit 57** is a true and correct copy of excerpts of the deposition transcript of Chris Urmson, dated August 24, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of September, 2017, in Washington, DC.

/s/ Martha Goodman

Martha L. Goodman